

City of Benicia • Police Department

Otto W. Giuliani, Chief of Police

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Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington DC, 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: PR Docket 92-235

Dear Ms. Searcy:

The major changes which are being proposed in FCC Docket 92-235 will have a significant impact on our Department's communications system. In speaking with our Department's communications technician, it is my understanding that our Department will experience the following problems if the rule changes are finalized as proposed:

1. Because the City is located in such hilly terrain, a reduction in power could in many instances reduce coverage below acceptable limits. A reduction in modulation will also degrade system performance by lowering the signal to noise ratio.
2. The voting receiver system that our Department just recently installed will not be capable of meeting new technical standards and replacement would be necessary.